



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

June 9, 2022

Via ECF & E-Mail

The Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Ronnell Booth, 15 Cr. 312 (PAE)*

Dear Judge Engelmayer:

The Government respectfully requests on consent of the defense an extension of time by which it must file its sentencing submission in the violation of supervised release proceedings in this case and an adjournment of the sentencing date, as further explained below.

At the May 24, 2022 change-of-plea hearing, the Court set a schedule for sentencing as follows: joint submission due by May 27, 2022; defense submission due by June 1, 2022; Government submission due by June 3, 2022; and sentencing on June 7, 2022. On June 1, 2022, with the consent of the Government, the defendant sought a one-week adjournment of the sentencing hearing and all corresponding deadlines. ECF No. 102. On June 2, 2022, the Court granted the defense application, setting the schedule for sentencing as follows: defense submission due by June 8, 2022; Government submission due by June 10, 2022; and sentencing on June 29, 2022.

On June 8, 2022, after 11:00 p.m., the defendant filed his sentencing submission with multiple exhibits and factual arguments regarding defendant's offense conduct and other relevant conduct. In light of the arguments made and the prior week-extension granted to defense, the Government respectfully requests a one-week extension, to June 17, 2022, to file its sentencing submission. The additional time will allow the Government to fully consider and respond to the defendant's arguments. Defense counsel consents to this request.

In addition, due to pre-scheduled travel and an upcoming trial, both counsel for the Government in this case are regrettably unavailable on June 29, 2022, the adjourned date for sentencing. In light of the issues and history of the defendant likely to be addressed at sentencing in this long-pending VOSR proceeding, in which both counsel have consistently appeared for the Government, the Government respectfully requests, with consent of the defense, that the Court

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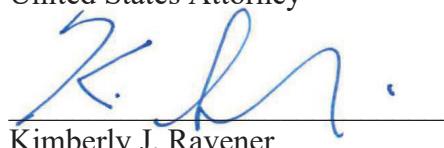
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adjourn sentencing to July 7, 8, or 11-15. Defense counsel and the Government have conferred regarding those dates and are both available. The Government greatly appreciates any accommodation the Court can make in this regard.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by:


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cc: Andrew Dalack, Esq. (by ECF & e-mail)
Probation Officer Joseph Perry (by e-mail)

GRANTED. Sentencing is adjourned to July 8, 2022 at 11:00 a.m.
The Clerk of Court is requested to terminate the motion at Dkt. No. 105.

6/10/2022

SO ORDERED.


PAUL A. ENGELMAYER
United States District Judge